



Via ECF Filing
Honorable Katherine Polk Failla
United States District Court
Southern District Of New York
40 Foley Square, Room 2103
New York, New York 10007

April 28, 2023

MEMO ENDORSED

Angel Ortega and Jorge Navarro, on behalf of themselves and other similarly situated individuals v. Trident Restoration, Inc., TRI Contracting, Inc., Ukrop, INC., Fine Restoration, Inc., Revive Restoration, Inc., Swift Assist, Inc., PG1 Construction, Inc., Crown Restoration, Inc., RSO Management, Inc., 558 Main Street, LLC, 115 Abeel Street, LLC, 2165 23rd Street LLC, Tri Builders, Inc., Triton Renovation Corp., Trident Renovation & Associates, Inc., Trident MGMT Re LLC, 64-66 Catherine Street Corp., Brooklyn Building Supply, Inc., TRI Contracting, Inc., CVP Construction Corp., JMS Misch LLC, Stefan Bohdanowycz, Peter Goian, and Vladimer Dobronravov.
NY Southern District Court - 1:23-cv-01927-KPF

Dear Honorable Katherine Polk Failla:

I was recently engaged by the Defendants in the above entitled action and request an extension of time to May 27, 2023 in order to respond to the Plaintiff's Complaint. I have contacted the Plaintiff's counsel and although they consented to this extension, it was subject to answering by May 20, 2023 and subject to waiving any objections to service which Plaintiff is not willing to do. I respectfully request the Court to grant this extension of time.

This is the first extension request in this matter. I thank your honor for the time taken to review this request.

Respectfully submitted,

/s/ Mitchell Segal

Mitchell Segal

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Application GRANTED.

The Clerk of Court is directed to terminate the pending motion at docket number 33.

Dated: April 28, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE